

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

QUORUM HEALTH CORPORATION, *et al.*,

Debtor.

DANIEL H. GOLDEN, AS LITIGATION
TRUSTEE OF THE QHC LITIGATION
TRUST, AND WILMINGTON SAVINGS
FUND SOCIETY, FSB, SOLELY IN ITS
CAPACITY AS INDENTURE TRUSTEE,

Plaintiffs,

v.

COMMUNITY HEALTH SYSTEMS, INC.;
CHS/COMMUNITY HEALTH SYSTEMS,
INC.; REVENUE CYCLE SERVICE CENTER,
LLC; CHSPSC, LLC; PROFESSIONAL
ACCOUNT SERVICES, INC.; PHYSICIAN
PRACTICE SUPPORT, LLC; ELIGIBILITY
SCREENING SERVICES, LLC; W. LARRY
CASH; RACHEL SEIFERT; ADAM
FEINSTEIN; AND CREDIT SUISSE
SECURITIES (USA) LLC,

Defendants.

Chapter 11

Case No. 20-10766 (BLS)

Adv. Pro. No. 21-51190 (BLS)

Ref. Docket Nos. 43 & 47

**JOINT REQUEST FOR ORAL ARGUMENT IN CONNECTION
WITH DEFENDANTS' MOTIONS TO DISMISS**

Pursuant to Del. Bankr. L.R. 7007-3, (i) Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein, (ii) Defendant Credit Suisse

Securities (USA) LLC (collectively, the “Defendants”), (iii) Plaintiff Daniel H. Golden, as Litigation Trustee of the QHC Litigation Trust, and (iv) Plaintiff Wilmington Savings Fund Society, FSB, solely in its capacity as Indenture Trustee in the above-captioned proceeding, respectfully jointly request oral argument on the Defendants’ Motions to Dismiss [Docket Nos. 43, 47] (the “Motions to Dismiss”) filed on January 14, 2022 and January 19, 2022, respectively. The Motions to Dismiss are fully briefed and ready for the Court’s consideration.

[Signature Pages Follow]

Date: May 9, 2022

/s/ Michael S. Neiburg

Michael S. Neiburg (DE No. 5275)
Christopher M. Lambe (DE No. 6846)
YOUNG CONAWAY STARGATT
& TAYLOR LLP
Rodney Square
1000 North King St.
Wilmington, DE 19801
Tel.: (302) 571-6600
Fax: (302) 571-1253
mneiburg@ycst.com

Counsel for Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, Rachel Seifert, and Adam Feinstein

Respectfully submitted,

Gary A. Orseck (admitted *pro hac vice*)
Alison C. Barnes (admitted *pro hac vice*)
William J. Trunk (admitted *pro hac vice*)
Jack A. Herman (admitted *pro hac vice*)
Lauren C. Andrews (admitted *pro hac vice*)
Jason A. Shaffer (admitted *pro hac vice*)
KRAMER LEVIN ROBBINS RUSSELL
2000 K Street, N.W., 4th Floor
Washington, D.C. 20006
Tel: (202) 775-4500
Fax: (202) 775-4510
gorseck@kramerlevin.com

Counsel for Defendants Community Health Systems, Inc., CHS/Community Health Systems, Inc., Revenue Cycle Service Center, LLC, CHSPSC, LLC, Professional Account Services, Inc., Physician Practice Support, LLC, Eligibility Screening Services, LLC, W. Larry Cash, and Rachel Seifert

ROLNICK KRAMER SADIGHI LLP

Marc B. Kramer (admitted *pro hac vice*)
Matthew Peller (admitted *pro hac vice*)
1251 Avenue of the Americas
New York, New York 10020
Tel: (212) 597-2800
Fax: (212) 597-2801
mkramer@rksllp.com

Sheila Sadighi (admitted *pro hac vice*)
300 Executive Drive
West Orange, New Jersey 07052

Counsel for Defendant Adam Feinstein

/s/ Robert C. Maddox

Mark D. Collins (DE No. 2981)
Robert C. Maddox (DE No. 5356)
RICHARDS LAYTON & FINGER, P.A.
One Rodney Square, 920 North King Street
Wilmington, DE 19801
Tel: (302) 651-7700
Fax: (302) 651-7701
collins@rlf.com
maddox@rlf.com

*Counsel for Defendant Credit Suisse Securities
(USA) LLC*

Herbert S. Washer (admitted *pro hac vice*)
Edward Moss (admitted *pro hac vice*)
Joel H. Levitin (admitted *pro hac vice*)
John MacGregor (admitted *pro hac vice*)
CAHILL GORDON & REINDEL LLP
32 Old Slip
New York, NY 10005
Tel: (212) 701-3000
Fax: (212) 269-5420
hwasher@cahill.com
emoss@cahill.com
jlevitin@cahill.com
jmacgregor@cahill.com

*Counsel for Defendant Credit Suisse Securities
(USA) LLC*

/s/ Timothy P. Cairns

Laura Davis Jones (DE No. 2436)
Timothy P. Cairns (DE No. 4228)
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Fl.
Wilmington, DE 19801
Tel: (302) 778-6401
Fax: (302) 652-4400
ljones@pszljaw.com
tcairns@pszljaw.com

*Counsel for Plaintiffs Daniel H. Golden, as
Litigation Trustee for the QHC Litigation
Trust, and Wilmington Savings Fund Society,
FSB, solely in its capacity as Indenture
Trustee*

Andrew J. Rossman (admitted *pro hac vice*)
Deborah J. Newman (admitted *pro hac vice*)
Jordan Harap (admitted *pro hac vice*)
Ari Roytenberg (admitted *pro hac vice*)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Fl.
New York, NY 10010
Tel: (212) 849-7000
Fax: (212) 849-7100
andrewrossman@quinnemanuel.com
deborahnewman@quinnemanuel.com
jordanharap@quinnemanuel.com
ariroytenberg@quinnemanuel.com

*Counsel for Plaintiffs Daniel H. Golden, as
Litigation Trustee for the QHC Litigation
Trust, and Wilmington Savings Fund
Society, FSB, solely in its capacity as
Indenture Trustee*